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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

In re JUNIPER NETWORKS, INC.
 SECURITIES LITIGATION

 This Document Relates To:

All Actions

) CASE NO.: C06-04327-JW (PVT)
)
) STIPULATION AND ~~PROPOSED~~
) ORDER RE THE JUNIPER
) DEFENDANTS' SECOND SET OF
) REQUESTS FOR ADMISSION AND
) SIXTH SET OF INTERROGATORIES

) BEFORE: Hon. Patricia V. Trumbull
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This Stipulation is entered into by and among Lead Plaintiff the New York City Pension Funds and Defendant Juniper Networks, Inc., Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth Levy and William R. Stensrud (the “Juniper Defendants”), by and through their respective attorneys of record.

WHEREAS, on November 30, 2009, Lead Plaintiff served its Responses and Objections to the Juniper Defendants’ Second Set of Requests for Admission and Sixth Set of Interrogatories (collectively, “Requests”);

WHEREAS, the parties met and conferred on December 2, 2009, and Lead Plaintiff agreed to serve amended responses to the Requests on or before January 11, 2010;

WHEREAS, pursuant to the same meet and confer, the parties also agreed that if the Juniper Defendants believe Lead Plaintiff’s amended responses are still deficient, and the parties cannot resolve the dispute through further meet and confers, the Juniper Defendants may file and serve a motion to compel further responses to the Requests within ten days from the date on which the parties reach an impasse, but in no event later than January 29, 2010.

THEREFORE, the parties stipulate, and request that the Court order, as follows:

If the parties have disputes regarding the sufficiency of Lead Plaintiff’s responses to the Juniper Defendants’ Second Set of Requests for Admission and Sixth Set of Interrogatories that cannot be resolved through meet and confers, the Juniper Defendants may file and serve a motion to compel further responses to the Second Set of Requests for Admission and Sixth Set of Interrogatories within ten days from the date on which the parties reach an impasses, but in no event later than January 29, 2010, and such motion will not be deemed untimely.

Respectfully submitted,

Dated: December 3, 2009

WILSON SONSINI GOODRICH & ROSATI

By: /s/ Joni Ostler
Joni Ostler

Counsel for the Juniper Defendants

1 Dated: December 3, 2009

LOWEY DANNENBERG COHEN & HART, P.C.

2 By: /s/ Deborah Rogozinski
3 Deborah Rogozinski

4 *Counsel for Lead Plaintiff*

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6 O R D E R

7 PURSUANT TO STIPULATION, IT IS SO ORDERED.

8 DATED: 12/7/09

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10 PATRICIA V. TRUMBULL
11 United States Magistrate Judge
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